

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

NICHOLAS GIOVANNELLI,)	
)	
Plaintiff,)	
)	
v.)	No. 21-CV-01092
)	
WALMART, INC., and WAL-MART.COM)	Judge Chang
USA, LLC,)	
)	Magistrate Judge Kim
Defendants.)	

JOINT STATEMENT ON DEFENDANTS' MOTION FOR ATTORNEYS' FEES

Defendants, Walmart Inc. and Wal-Mart.Com USA, LLC, and Plaintiff, Nicholas Giovannelli, by and through their attorneys, pursuant to Local Rule 54.3(e), hereby submit their Joint Statement on Defendants' Motion for Attorneys' Fees.

1. Defendants were awarded judgment in their favor in this case on September 26, 2024 (ECF 100).
2. Defendants intend to file a motion for attorneys' fees in this case.
3. Pursuant to Local Rule 54.3(d), on October 14, 2024, Defendants provided Plaintiff with the time and work records on which Defendants' motion for attorneys' fees will be based, and specifies the hours for which compensation will and will not be sought, along with the hourly rates that will be claimed for each lawyer, paralegal, or other person. (Ex. A).
4. Plaintiff has examined the time and work records produced by the Defendants and does not object to the hourly rates or the hours billed. The statute under which Defendants seek fees, Illinois Right to Publicity Act, states that the "Court may" award fees. 765 ILCS 1075/55. Plaintiff objects to any award of fees being awarded under the circumstances of this case.

For the Defendants:

By: /s/ James Borcia

Defendants' Attorney

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For the Plaintiff:

By: /s/ Craig D. Tobin

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